

GPS UPDATES 2017

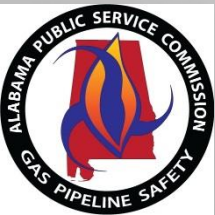
30TH ANNUAL GAS PIPELINE SAFETY SEMINAR

MONTGOMERY, ALABAMA

DECEMBER 6, 2017

Wallace Jones

**Director, Gas Pipeline Safety Division
Alabama Public Service Commission**



REGULATORY TOPICS OF INTEREST

- **RECENT REGULATIONS**
- **ADVISORY BULLETINS**



2016 REAUTHORIZATION OF THE PIPELINE SAFETY ACT

- PIPES ACT SIGNED BY PRESIDENT OBAMA ON JUNE 22, 2016
- [HTTP://WWW.PHMSA.DOT.GOV/PIPES-ACT](http://www.phmsa.dot.gov/pipes-act)
- THERE WERE SEVERAL MANDATES RELATED TO INFORMATION TECHNOLOGY, UNDERGROUND STORAGE, EMERGENCY ORDER AUTHORITY FOR PHMSA, ENHANCED INCIDENT REPORTING, TRANSMISSION ODORIZATION STUDY, ETC.



RECENT REGULATIONS

- PLASTIC PIPE NPRM - PUBLISHED 5/21/2015
- MOST REVISIONS LOW IMPACT TO OPERATORS
- PROVIDES FOR UPDATES TO TECHNICAL REFERENCES AND CLARIFICATIONS
- EXPECTATION OF FINAL RULE IN 2017. SOME FINAL RULES HELD UP BY JANUARY 2017 LETTER FROM REINCE PRIEBUS, CHIEF OF STAFF

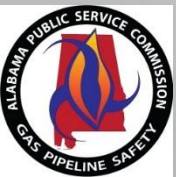


RECENT REGULATIONS (CONTINUED):

PIPELINE SAFETY: PIPELINE DAMAGE PREVENTION PROGRAMS

Effective Date: 1/1/2016 - (Final Rule)

- PHMSA has completed the reviews of the state DP Programs
- Some states still awaiting status letter. Some were deemed inadequate
- PHMSA will follow enforcement guidelines for states with inadequate DP rules or programs per Part 198
- PHMSA can enforce on violating excavators in states without an adequate DP program under Part 196; it remains to be seen to what extent this will occur
- Alabama is pursuing legislation to improve their damage prevention laws - Attorney General is acting on some complaints of cable and gas



RECENT REGULATIONS (CONTINUED):

Pipeline Safety: Expanding the Use of Excess Flow Valves in Gas Distribution Systems to Applications Other Than Single-Family Residences

Effective Date: April 14, 2017 - (Final Rule)

- § 192.381 Service lines: Excess flow valve performance standards.
 - (Amended) - Removed “single residence”
- § 192.383 Excess flow valve installation. (Amended) - Added “*Branched service line*”; several changes to (b) “*Installation Required*”; added (c) “*Exceptions to excess flow valve installation requirement*”
- § 192.385 Manual service line shut-off valve installation. (Added)



RECENT REGULATIONS (CONTINUED):

PIPELINE SAFETY: MISCELLANEOUS CHANGES TO PIPELINE SAFETY
REGULATIONS: RESPONSE TO PETITIONS FOR RECONSIDERATION
OF §192.305 (9/30/2015)

- 192.305 Final Rule implementation of this particular subsection was delayed due to controversy
- 192.305 Working Group was formed by PHMSA to evaluate and discuss rule and come up with alternative wording
- NAPSAR has contributed to efforts and has two Program Managers on the working group
- Some initial efforts, then PHMSA lead left
- Working group on hold awaiting PHMSA direction and appointment of new lead

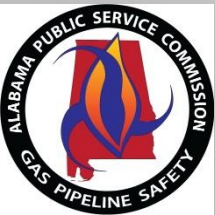


RECENT REGULATIONS (CONTINUED):

- Pipeline Safety: Enhanced Emergency Order Procedures

Effective Date: October 14, 2016 - (Interim final rule)

- Establishes regulations implementing the emergency order authority conferred on the Secretary of Transportation
- Changes to Part 190 includes definitions for “*Emergency Order*” and “*Imminent Hazard*”
- Emergency order means a written order imposing restrictions, prohibitions, or safety measures on affected entities



RECENT REGULATIONS (CONTINUED):

Pipeline Safety: Operator Qualification, Cost Recovery, Accident and Incident Notification, and Other Pipeline Safety Changes

- Effective Date: 3/24/2017 (Final Rule)
- § 192.225 Welding procedures
- § 192.227 Qualification of welders
- § 192.631 Control room management
- § 192.740 Pressure regulating, limiting, and overpressure protection—Individual service lines directly connected to production, gathering, or transmission pipelines
- § 192.1003 What do the regulations in this subpart cover?

Added Paragraph (b) “*Exceptions*”



RECENT REGULATIONS (CONTINUED):

Pipeline Safety: Guidance on Training and Qualifications for the Integrity Management Program - Advisory Bulletin (ADB-2017-02)

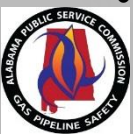
Effective Date: 4/10/2017

- Advisory Bulletin to remind operators of natural gas transmission pipelines of PHMSA's expectations regarding how mature IM programs should implement the training and qualification requirements included in § 192.915 and discussed in ASME B31.8S-2004



RECENT REGULATIONS (CONTINUED):

- PIPES ACT (SECTION 12) REQUIRES PHMSA TO HAVE SAFETY STANDARDS IN PLACE FOR UNDERGROUND STORAGE FACILITIES WITHIN 2 YEARS OF EFFECTIVE DATE OF THE ACT
- INTERIM FINAL RULE PUBLISHED IN FR ON DECEMBER 19, 2016
- INTERIM FINAL RULE INCORPORATES API RP 1170 AND 1171 AS GUIDANCE
- MANDATE AND INTERIM FINAL RULE CONSIDERATION OF THE RESULTS OF ALISO CANYON TASK GROUP (SECTION 31) IN DEVELOPMENT OF REGULATIONS
- USER FEES HAVE BEEN SET UP BY PHMSA
- PHMSA STATE PROGRAMS IS IN PROCESS OF EVALUATING HOW TO IMPLEMENT THE INSPECTION PROGRAM. WILL ALL STATES PS PROGRAMS BE CERTIFIED TO INSPECT? PHMSA IS WORKING ON DEVELOPING A NEW CERTIFICATION PROGRAM FOR UG STORAGE
- SOME STATES ALREADY INSPECT VIA ANOTHER DEPARTMENT (I.E. “DEPARTMENT OF NATURAL RESOURCES” ETC.) NEED TO DETERMINE IF INTEGRATION MAKES SENSE
- PHMSA HAS RE-OPENED THE “COMMENT PERIOD” UNTIL NOVEMBER 20, 2017



AGA PIPELINE SAFETY MANAGEMENT SYSTEM WORKSHOP (PSMS)

- NATIONAL ASSOCIATION OF PIPELINE SAFETY REPRESENTATIVES (NAPSR) IS SUPPORTIVE OF SMS
- SEVERAL NAPSR STATE PROGRAM MANAGERS PARTICIPATED IN AGA WORKSHOP IN APRIL AND PROVIDED NAPSR INPUT TO THE API SMS COMMITTEE
- “SCALABLE” ISSUE FOR SMALL OPERATORS NEEDS TO BE ADDRESSED - APGA IS WORKING ON THIS
- NAPSR FEELS THAT SMS CAN WORK ON ANY SCALE WITH SENSIBLE STRUCTURING OF THE INDIVIDUAL PROGRAMS



OTHER RULEMAKING IN PROGRESS

- OPERATOR QUALIFICATION FINAL RULE – NPRM PUBLISHED JULY 10, 2015, ALSO INCLUDED REVISIONS TO 192.631 CRM. NAPSR PARTICIPATING IN WORKING GROUP. RULE HAS CURRENTLY BEEN PUT ON HOLD
- RUPTURE DETECTION AND VALVES RULE – IN PROGRESS
- GAS TRANSMISSION AND GATHERING LINE NPRM (MEGA-RULE) – STILL IN PROGRESS. RESPONSE VOLUME WAS LARGE, PHMSA STILL CONSIDERING



COMPENDIUM

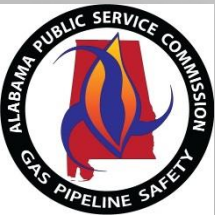
- NAPS R COMPENDIUM IS UPDATED AND ISSUED PERIODICALLY
- THE COMPENDIUM HIGHLIGHTS REGULATIONS THAT EXCEED THE FEDERAL MINIMUM STANDARDS
- STATES WITH ADDITIONAL STATE REGULATIONS THAT INCREASE PIPELINE SAFETY ARE LISTED AND THE REGULATIONS SUMMARIZED
- NAPS R COMMITTEE IS WORKING ON THIS AS WE SPEAK. NEXT ISSUE IS DUE AT THE END OF 2017
- CURRENT 2013 VERSION IS ON WEB SITE AT:

[HTTP://WWW.NAPS R.ORG/PAGES/COMPENDIUM.ASPX](http://www.napsr.org/pages/compendium.aspx)



STATE REGULATIONS

- **49 U.S. CODE § 60104 - REQUIREMENTS AND LIMITATIONS**
 - (C)PREEMPTION.— A [STATE](#) AUTHORITY THAT HAS SUBMITTED A CURRENT CERTIFICATION UNDER [SECTION 60105\(A\) OF THIS TITLE](#) MAY ADOPT ADDITIONAL OR MORE STRINGENT SAFETY STANDARDS FOR INTRASTATE PIPELINE FACILITIES AND INTRASTATE PIPELINE TRANSPORTATION ONLY IF THOSE STANDARDS ARE COMPATIBLE WITH THE MINIMUM STANDARDS PRESCRIBED UNDER THIS CHAPTER.



STATE REGULATIONS

Proposed GPS Rule 13 - Inactive Services

- 19 Violations written on atmospheric corrosion during CY-2017























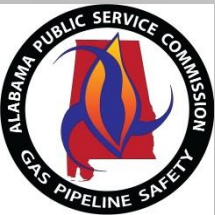






§ 192.740 PRESSURE REGULATING, LIMITING, AND OVERPRESSURE PROTECTION

- INDIVIDUAL SERVICE LINES DIRECTLY CONNECTED TO PRODUCTION, GATHERING, OR TRANSMISSION PIPELINES
 - (A) THIS SECTION APPLIES, EXCEPT AS PROVIDED IN [PARAGRAPH \(C\)](#) OF THIS SECTION, TO ANY [SERVICE LINE](#) DIRECTLY CONNECTED TO A PRODUCTION, GATHERING, OR TRANSMISSION [PIPELINE](#) THAT IS NOT OPERATED AS PART OF A DISTRIBUTION SYSTEM.
 - (B) EACH PRESSURE REGULATING OR LIMITING DEVICE, RELIEF DEVICE (EXCEPT RUPTURE DISCS), AUTOMATIC SHUTOFF DEVICE, AND ASSOCIATED EQUIPMENT MUST BE INSPECTED AND [TESTED](#) AT LEAST ONCE EVERY 3 CALENDAR YEARS, NOT EXCEEDING 39 MONTHS, TO DETERMINE THAT IT IS:



§ 192.740 PRESSURE REGULATING, LIMITING, AND OVERPRESSURE PROTECTION

- (1) IN GOOD MECHANICAL CONDITION;
- (2) ADEQUATE FROM THE STANDPOINT OF CAPACITY AND RELIABILITY OF OPERATION FOR THE SERVICE IN WHICH IT IS EMPLOYED;
- (3) SET TO CONTROL OR RELIEVE AT THE CORRECT PRESSURE CONSISTENT WITH THE PRESSURE LIMITS OF [§ 192.197](#); AND TO LIMIT THE PRESSURE ON THE INLET OF THE [SERVICE REGULATOR](#) TO 60 PSI (414 KPA) GAUGE OR LESS IN CASE THE UPSTREAM REGULATOR FAILS TO FUNCTION PROPERLY; AND
- (4) PROPERLY INSTALLED AND PROTECTED FROM DIRT, LIQUIDS, OR OTHER CONDITIONS THAT MIGHT PREVENT PROPER OPERATION.























THANK YOU!

QUESTIONS?

